

**EXHIBIT A**

**Form of Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re** : **Chapter 11 Case No.**  
: **08-13555 (SCC)**  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **(Jointly Administered)**  
**Debtors.** :  
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**ORDER GRANTING MOTION OF SRM GLOBAL MASTER FUND  
LIMITED PARTNERSHIP FOR LEAVE TO FILE UNDER SEAL**

Upon consideration of the *Motion of SRM Global Master Fund Limited Partnership for Leave to File Under Seal*, dated July 5, 2016 (the “Motion”);<sup>1</sup> and this Court having jurisdiction to consider the Motion and the relief requested in accordance with 28 U.S.C. §§ 157 and 1334; and due notice of the Motion as set forth therein being sufficient under the circumstances and that no other or further notice need be provided; after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the Motion is granted as provided herein; and it is further

ORDERED that SRM is authorized to file the Pleadings under seal pursuant to section 107(b) of the Bankruptcy Code and Rule 9018 of the Federal Rules of Bankruptcy Procedure; and it is further

ORDERED that SRM is authorized to file a redacted version of each Pleading on the electronic docket maintained by this Court for these chapter 11 cases; and it is further

ORDERED that SRM shall provide an unredacted copy of each Pleading, on a confidential basis, to the Court, the Plan Administrator, and the United States Trustee for the Southern District of New York; and it is further

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<sup>1</sup> Capitalized terms used herein without definition shall have the meanings assigned to them in the Motion.

ORDERED that any party permitted access to an unredacted copy of any Pleading shall not share with any third party any information that is redacted in the version of such Pleading filed on this Court's electronic docket, and any party found to have violated these conditions shall be subject to sanctions for violation of this Order; and it is further

ORDERED that the unredacted copies of the Redacted Documents shall remain under seal and shall not be made available to anyone, other than as provided for in this Order, without the consent of SRM and the Plan Administrator or without further order of the Court; and it is further

ORDERED that the Clerk of the Court shall treat the unredacted copies of the Redacted Documents as confidential, and counsel for SRM shall contact the Clerk's Office regarding the return or disposition of the Redacted Documents at the close of this case; and it is further

ORDERED that this Order is without prejudice to the rights of any party in interest or the Office of the United States Trustee to seek to make public any portion of the pleadings and/or documents filed under seal pursuant to this Order by filing an appropriate motion with the Court on proper notice to the Plan Administrator and SRM; and it is further

ORDERED that the Court shall retain jurisdiction over any matter or dispute arising from or relating to implementation of this Order.

SIGNED this \_\_\_\_ day of July, 2016

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HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE